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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

Paul Edward Hamilton and Lisa Louis Hamilton-Clark,

Case No. 17cv431 DWF/TNL

Plaintiffs,

Judge: _____

v.

COMPLAINT

Walker Methodist Foundation
(Non-Profit Organization)
3737 Bryant Avenue South
Minneapolis, MN. 55409

Walker Methodist Health Center
(Assisted Living Facility)
3737 Bryant Avenue South
Minneapolis, MN. 55409

Defendants,

COMPLAINT FOR NEGLIGENCE, NEGLIGENT SUPERVISION, FAILURE TO MAINTAIN
AN ENVIRONMENT REASONABLY SAFE AND FREE OF HAZARDS, NEGLIGENT HIRING,
FAILURE TO MAINTAIN ADEQUATE HEALTH AND SAFETY POLICIES, NEGLIGENT
SUPERVISION, FAILURE TO PROVIDE TIMELY AND ADEQUATE MEDICAL ASSISTANCE AND
TREATMENT, FAILURE TO PROVIDE ADEQUATE SUPERVISION AND ASSISTANCE
DEVICES TO PREVENT ACCIDENTS, RECKLESS ENDANGERMENT AND MEDICAL MALPRACTICE.

JURISDICTION


1. The Plaintiffs bring their complaint under Federal Regulation 42 CFR sec. 483.25 (h).

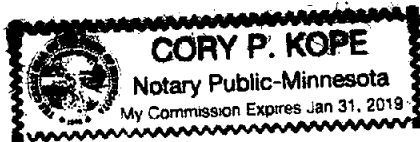
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U.S. DISTRICT COURT MPLS


- The Residents environment remains as free of accidents and other hazards as much as possible.
 - And each resident receives adequate supervision and assistance devices to prevent accidents, or other harm. We believe Walker Methodist failed to meet these legally required standards.
8. Wherefore the plaintiff demands judgment against both Walker Methodist Foundation and Walker Methodist Health Center and Assisted Living Facility in the sum of One-Million Dollars, Legal Fees, Court Costs and the Tax-Liability on any Disbursements paid to the Plaintiffs.


Paul Edward Hamilton
(Plaintiff)



STATE OF MINNESOTA
County of Hennepin

This instrument was acknowledged
before me on 3rd February of 2017
By Paul Edward Hamilton.


(Signature of Notary Official)

Lead Representative
(Title (and Rank))

My Commission Expires:
01/31/2019

Demand For JURY
TRIAL

YES X NO